

REMARKS/ARGUMENTS

The office action of September 21, 2005 has been carefully reviewed and these amendments and remarks are responsive thereto. Claims 1, 6, 11 and 14-16 have been amended. Claims 17 and 18 have been added. No new matter has been added. Claims 1-18 remain pending after entry of this amendment. Reconsideration and allowance of the instant application are respectfully requested.

Claim Rejections Under 35 U.S.C. §102(e)

Claims 1-10 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Robotham *et al.* (U.S. Patent No. 6,704,024, hereinafter "Robotham"). This rejection is respectfully traversed for the following reasons.

Amended independent claims 1 and 6 relate to, *inter alia*, receiving ink input from a user. Nowhere does Robotham teach or suggest such a feature. The Office Action, on p. 2, asserts that Robotham discloses rendering ink. However, the cited passage only discloses a process of converting visual content such as electronic documents, spreadsheets, Web pages, electronic forms and electronic mail. Col. 1, ll. 23-34. None of these types of visual content are similar to ink. In addition to failing to teach or suggest ink, Robotham further lacks any teaching or suggestion of receiving ink input from a user, as is recited in claims 1 and 6. As such, claims 1 and 6 are allowable for at least this reason.

Claims 2-5 and 7-10 are dependent on claims 1 and 6 and are thus allowable for at least the same reasons as their respective base claims and further in view of the novel and non-obvious features recited therein.

Claim Rejections Under 35 U.S.C. §103(a)

Claims 11-16 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Robotham in view of Aleksic *et al.* (U.S. Patent No. 6,927,778, hereinafter "Aleksic"). This rejection is respectfully traversed for the following reasons.

Amended independent claims 11 and 14 both relate to, *inter alia*, creating a transparency map, wherein the transparency map stores transparency information corresponding to ink input from a user. As discussed previously with respect to claim 1, Robotham fails to teach or suggest

ink, much less the recited feature of claim 11. Aleksic fails to cure such a deficiency. At most, Aleksic discloses storing source image data in a first plane of system memory. Col. 3, ll. 23-26. However, source image data is not at all similar to ink input from a user, as is recited in claims 11 and 14. As such, claims 11 and 14 are allowable for at least this reason.

Claims 11 and 14 further relate to, *inter alia*, applying foreground information to said transparency map to define one or more attributes of said ink. Nowhere does either Robotham or Aleksic, either separately or in combination, teach or suggest such a feature. The Office Action concedes on p. 5 that Robotham does not specifically mention the combining of foreground and background information, but asserts that Aleksic discloses such a feature. Contrary to the Office Action's assertion, the cited passage in Aleksic merely describes combining pixel data of a foreground object to the pixels of a background object to simulate particular image effects. Col. 2, ll. 52-57. At best, Aleksic discloses supplying alpha values to define a proportion of the foreground object. However, claims 11 and 14 relate to applying foreground information *to a transparency map* to define one or more attributes of *ink*. Defining a proportion of a foreground object and using foreground information to define or more attributes of ink are wholly dissimilar processes. Claim 11 and 14 are thus allowable for this additional reason.

Claims 12-13 and amended dependent claims 15-16 are dependent on claim 11 and 14, respectively, and are thus allowable for at least the same reasons as claims 11 and 14 and further in view of the novel and non-obvious features recited therein.

New Claims

New dependent claims 17 and 18 have been added and are allowable for at least the same reasons as their respective base claims and further in view of the novel and non-obvious features recited therein. No new matter has been added.

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Reply to Office Action of September 21, 2005

CONCLUSION

It is believed that no fee is required for this submission. If any fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicit prompt notification of the same.

Respectfully submitted,
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